

United States Bankruptcy Court
Eastern District of Wisconsin

In re: **Juan M. SANCHEZ, Jr. and Minerva I. SANCHEZ,**

Debtor

Case No.: 19-26172-KMP

Chapter: **7**

Address: **5208 Millbank Road**
Greendale, WI 53129
Employer's Tax Identification (EIN) No(s): 46-4885895

Last four digits of Social Security No(s) : **xxx-xx-3485**
xxx-xx-0219

**OBJECTION TO MOTION OF MTGLQ INVESTORS LP FOR RELIEF
FROM AUTOMATIC STAY AND MOTION TO FILE *INSTANTER***

DEBTOR, Juan M. SANCHEZ, Jr. and Minerva I. SANCHEZ, by and through counsel, Attorney T. Michael BARRETT does hereby object to the Motion of MTGLQ Investors L.P. for relief from the stay, and they request a hearing on the Motion, responding further that Debtors have expressed their intention to redeem the subject homestead, and with the strong housing market, the Movant MTGLQ will not be prejudiced by the stay, as Debtors will make the Movant MTGLQ whole in the final analysis.

MOTION TO EXTEND AND FILE *INSTANTER*

Debtors further move to allow this Objection to be lodged as if timely filed a day late, as Debtors' counsel has had to assist his daughter recover from major surgery which consisted of removal of excess tissue mass in both breasts this past week and this response had slipped.

Respectfully dated and submitted this 31st day of July, 2019:

Date **July 31, 2019**

Signature **/s/ T. Michael Barrett**
Name **T. Michael Barrett 1001605**
Address **T. Michael BARRETT**
12215 W. Bluemound Road, Ste. A
Wauwatosa, WI 53226